

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA

Plaintiff,
Defendant in Counterclaim,

v.

THOMAS L. MENARD

Defendant,
Plaintiff in Counterclaim,

and

ADAM SHIPPEE

Defendant,

and

KYLINA BRAGA,
BRANDON SHIPPEE,
DYLANA SHIPPEE,
And DOES 1-5

Defendants.

C.A. No.: 06-395T

**RHODE ISLAND STATE POLICE'S OBJECTION TO THE SUBPOENA
ISSUED BY THE PLAINTIFF THE PRUDENTIAL INSURANCE COMPANY**

Now comes the Rhode Island State Police pursuant to Rule 54(c) of the Federal Rules of Civil Procedure and object to the subpoena duces tecum served upon it on July 12, 2007 by Plaintiff The Prudential Insurance Company. The subpoena duces tecum seeks:

Any and all records and documents in your possession, custody or control relating to the investigation file for the homicide of the following individual:

Name: Dawn M [REDACTED] e Shippee
Date of [REDACTED]
SSN#: [REDACTED]

See Exhibit A: Subpoena duces tecum to Rhode Island State Police.

The Rhode Island State Police object to the subpoena duces tecum as the death of Dawn Michelle Shippee (dob 5/17/72) is an open criminal investigation and any documents are protected from disclosure pursuant to the law enforcement privilege.

Respectfully Submitted,

RHODE ISLAND STATE POLICE
By its Attorney

PATRICK C. LYNCH
ATTORNEY GENERAL

/s/ Brenda D. Baum

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CERTIFICATION

I hereby certify that I have electronically mailed the foregoing document on this 23rd of July, 2007, to the attorney(s) of record listed below:

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/s/ **Brenda D. Baum**

CERTIFICATION

I, the undersigned, hereby certify that a copy of the within document was mailed, postage prepaid, on this 23rd day of July, 2007 to the attorney(s) of record listed below:

Edward P. O'Leary, Esq.
Fitzhugh, Parker, & Alvaro LLP
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/s/ Brenda D. Baum